

EXHIBIT A

Declaration of Marleen Srok

EXHIBIT A

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 KRISTINA KERLUS, individually,

Case No.: 2:24-cv-02352-APG-DJA

4 Plaintiff,

5 vs.

DECLARATION OF MARLEEN SROK

6 DR. JENNIFER CORNEAL, in her individual
7 capacity; A. SANTOS, in her individual
8 capacity; CITY OF LAS VEGAS, a Municipal
9 corporation; and COUNTY OF CLARK, a
10 Municipal corporation; LAS VEGAS
11 METROPOLITAN POLICE DEPARTMENT,
12 jointly and severally

13 Defendants.

14 Now comes Marleen Srok, who declares as follows:

15 1. I am over the age of twenty-one and am competent to make this Declaration.

16 2. I have personal knowledge of the facts set forth herein unless stated otherwise.

17 3. I am employed by the Las Vegas Metropolitan Police Department ("LVMPD") as
18 an Investigative Specialist.

19 4. My assigned duties as an Investigative Specialist include receiving, reviewing,
20 and internally saving notices from citizens regarding civil claims against LVMPD or its
21 employees, which includes pre-litigation demand letters and civil complaints filed in State or
22 Federal court.

23 5. In the ordinary course of business, LVMPD's Risk Management department
24 retains all records regarding written notice of potential civil claims that have been or are likely to
be filed against LVMPD or against its employees for actions taken within the scope of
employment with LVMPD.

6. In preparing this Declaration, I coordinated with LVMPD's Risk Management

1 department to determine when LVMPD first received written notice of Plaintiff Kristina Kerlus's
2 intent to bring civil claims against LVMPD or its employees in the above-captioned matter based
3 on actions taken as part of employment with LVMPD.

4 7. My review of records and coordination with LVMPD's Risk Management
5 department did not locate any written notice by Plaintiff or her counsel regarding claims or intent
6 to bring claims against LVMPD or its employees, until LVMPD's General Counsel's Office
7 received by email a copy of a summons directed to A. Santos on April 8, 2025.

8 8. LVMPD itself did not receive by mail or process server a written notice of claims
9 or version of a complaint in this above-captioned matter until May 14, 2025.

10 9. I make these statements under the penalty of perjury and based on the information
11 known to me to date.

12
13 DATED this 27 day of May, 2025.

14
15
16 By: Marleen Srok

17 **Marleen Srok, Investigate Specialist**
18
19
20
21
22
23
24